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UNITED SCHUTZHUND CLUBS OF AMERICA and

JIM ALLOWAY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ZOLTAN NAGY,

Plaintiffs,

vs.

UNITED SCHUTZHUND CLUBS OF
AMERICA; JIM ALLOWAY, and
DOES 1 to 10,

Defendants.

CASE NO. 3:19-cv-08459-MMZ

**DECLARATION OF VADIM
PLOTSKER IN SUPPORT OF
MOTION**

District Judge: Honorable Maxine M.
Chesney
Courtroom: 7, 19th Floor

Action Filed: December 30, 2019

I, Vadim Plotsker, declare as follows:

1. I am the President of the United Schutzhund Clubs of America (“USCA”), and have held this position since 2018. As such, I am intimately familiar with all policies and procedures that Plaintiff calls into question.

2. The United Schutzhund Clubs of America (hereinafter “USCA”) is a not-for-profit social club with a primary purpose of promoting and protecting the working heritage of the German Shepherd Dog breed, and the dog training and

1 exhibition sport of IPO (also known as Schutzhund).

2 3. The USCA maintains a principal (and sole) office at 19 Fox Valley Ctr,
3 Arnold, Missouri 63010.

4 4. The USCA does not maintain any office or other place of business with
5 the State of California.

6 5. The USCA hosts three national events each year- The German
7 Shepherd Dog National Championship, The Working Dog Championships, and the
8 Sieger Show. In the past ten years, two (2) of thirty competitions (30) have been
9 hosted in California.

10 6. USCA has three employees and all other individuals associated with
11 the USCA are volunteers. Two of the employees live in Missouri and one lives in
12 Illinois.

13 7. USCA has six officers—the President, Vice President, Treasurer,
14 Secretary, Director of Judges, and National Breed Warden.

15 8. The President, Vice President, Treasurer, Secretary, Director of Judges,
16 and National Breed Warden is Vadim Plotsker, Mark Scarberry, Jim Alloway,
17 Michele Clubb, Nathaniel Roque, and Heidi Theis. These six officers reside in New
18 Hampshire, Ohio, Ohio, California, California, and Idaho, respectively.

19 9. Jim Alloway has known Plaintiff for over six years, and prior to this
20 suit, considered him a friend. Additionally, Jim Alloway was one of three authors to
21 the disciplinary charges brought against the Plaintiff

22 10. USCA has four Directors at Large, who reside in Indiana, Illinois, and
23 Georgia.

24 11. USCA has a five-person Judges Committee, of which the five judges
25 reside in New Hampshire, Georgia, New Jersey, Kentucky, and California.

26 12. During the Plaintiff's tenure as a Performance Judge, he was selected to
27 judge the 2017, 2018, and 2019, Working Dog Championship Competitions. These
28 three competitions took place New York, Ohio, and Boston, respectively.

1 13. The events which form the basis for Plaintiff's Complaint occurred at
2 The 2019 Working Dog Championships, held in Spencer, Massachusetts from
3 May2-5, 2019.

4 14. The primary individuals with knowledge of the alleged conduct and/or
5 omissions are myself, Jim Alloway, Nathaniel Roque, Ann Marrie Chaffin, Raino
6 Fluegge, Don Yelle, Sean Murphy, and Avi Cohen.

7 15. The primary eye witnesses for this matter are Ann Marrie Chaffin,
8 Raino Fluegge, Don Yelle, Sean Murphy, and Jim Alloway.

9 16. Ann Marrie Chaffin and Raino Fluegge, The two other Judges at the
10 2019 Working Dog Championships, reside in Colorado and Canada, respectively.

11 17. Don Yelle and Sean Murphy, two helpers at the Competition who
12 witnesses the alleged incidents, and co-authors of the disciplinary charge brought
13 against Plaintiff, reside in Connecticut and Michigan, respectively. Avi Cohen lives
14 in California.

15 18. The Plaintiff did not judge any official USCA competitions in the state
16 of California during his tenure as a Performance Judge.

17 19. The USCA owns no property in the State of California.

18 20. The USCA conducts no banking or other financial transactions within
19 the State of California.

20 21. The USCA conducts no advertising beyond maintaining a publicly
21 accessible website.

22 22. The USCA has not incurred or paid taxes in the State of California, in
23 at least the last ten years.

24 23. The USCA has not appointed an agent for service of process in the
25 State of California.

26 24. The USCA does not file any reports with any governmental agency in
27 the State of California.

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4818-6099-0928.1
4835-4899-0159.1

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct and that this declaration was executed
3 on October 27, 2020, at 1 PM, New Hampshire.

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Vadim Plotsker

FEDERAL COURT PROOF OF SERVICE

Nagy v. United Schutzhund Clubs of America, et al.
3:19-cv-08459-CRB

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On October 27, 2020, I served the following document(s): DECLARATION OF VADIM PLOTSKER IN SUPPORT OF MOTION

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

James Mills	Attorneys for Plaintiff
Law Offices of James Mills	
1300 Clay Street, Suite 600	
Oakland, CA 94612	
Tel: 510-521-8748	
Email: james@jamesmillslaw.com	

The documents were served by the following means:

☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on October 27, 2020, at Los Angeles, California.



Lily Hernandez